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6  
7 IN THE UNITED STATES DISTRICT COURT  
8  
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA, )  
10 Plaintiff, ) No. CR 07-559 JSW  
11 vs. )  
12 MICHAEL YOUNG, )  
13 Defendant. )  
14 )  
15 )  
15 **STIPULATION**

)  
Date: March 31, 2008  
Time: 9:30 a.m.  
Court: The Honorable Joseph C.  
Spero

16 The parties hereby stipulate and agree as follows:

- 17 1. The government has filed its opening brief in its interlocutory appeal to the Ninth  
18 Circuit;  
19 2. The appeal will likely take months to resolve, as the parties must brief the matter, wait  
20 for oral argument to be calendared, argue the matter, and wait for a decision;  
21 3. Defense counsel accordingly requests a bail hearing for Mr. Young on March 31, 2008  
22 at 9:30 a.m. to request bail pending appeal for Mr. Young, so he can be placed in an  
23 appropriate drug treatment program;  
24 4. AUSA Allison Danner has no objection to setting a bail review hearing on March 31,

25  
26  
27

1 || 2008;

### 3 || IT IS SO STIPULATED.

5 || DATED: 3/24/08

8 || DATED: 3/24/08

ALLISON MARSTON DANNER  
Assistant United States Attorney

**[PROPOSED] ORDER**

12 Based upon the aforementioned representations of the parties, it is hereby ORDERED that a  
13 further bail hearing in this matter be set on March 31, 2008 at 9:30 a.m.

15 || DATED: March 24, 2008

THE HONORABLE JOSEPH SPERO  
UNITED STATES DISTRICT COURT JUDGE

**STIP & ORDER for Further  
Bail Hearing - 07-559 JSW**

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